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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE
RIVAS, M.H., CECILIA DANIELA
GONZÁLEZ HERRERA, ALBA CECILIA
PURICA HERNÁNDEZ, E.R., and
HENDRINA VIVAS CASTILLO,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 25-cv-1766

**EXPERT DECLARATION OF MELANIE
MORTEN IN SUPPORT OF PLAINTIFF'
MOTION TO POSTPONE EFFECTIVE
DATE OF AGENCY ACTION**

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EXPERT DECLARATION OF MELANIE MORTEN

1
2 1. I, Melanie Morten, am an Associate Professor of Economics at Stanford University. If
3 called to testify, I could and would do so as follows:

4 2. I have been asked to provide an expert opinion on the economic impact of terminating
5 Venezuela's Temporary Protected Status (TPS). I make this declaration based on my personal and
6 professional knowledge, my skill, experience, training, and education, and facts and data regularly
7 relied upon in my field that are currently available to me. If additional information becomes
8 available, or if I believe it would be appropriate to respond to any critique or contrary theories, I will
9 advise Plaintiffs' counsel that I intend to do so and will seek their help in following the appropriate
10 judicial procedures. The opinions in this declaration are my own.

11 3. In addition to being an Associate Professor of Economics at Stanford, I serve as a
12 senior fellow at the Stanford Institute for Economic Policy Research (SIEPR), a research associate at
13 the National Bureau for Economic Research, and hold many other academic affiliations. In addition,
14 I am the co-director of the Stanford Guestworker Migration Initiative, which I have directed since
15 2022. I have a Ph.D. in Economics from Yale University. Before attaining my Ph.D., I completed a
16 bachelor's degree in economics (with honours) from the University of Auckland, New Zealand.
17 I have received fellowships from the National Science Foundation, 3ie, The International Growth
18 Center, and many others. My research has generally focused on the economic determinants and
19 effects of human migration. I am widely published and a frequent speaker on issues of migration,
20 poverty, urbanization and spatial economics. A true and correct copy of my curriculum vitae is
21 attached as Appendix A.

22 4. TPS holders have the legal right to work in the U.S., with employment rates estimated
23 between 81% and 96%. They earn income, pay federal and local taxes, and contribute to Social
24 Security and Medicare. Those who own homes also contribute through property taxes.
25 Estimates of the economic contribution of TPS holders are typically based on data from the
26 American Community Survey (ACS), an annual survey conducted by the U.S. Census Bureau. The
27 Census Bureau describes the ACS as "the premier source for detailed population and housing
28 information about our nation." (<https://www.census.gov/programs-surveys/acs>). While the ACS does

not directly ask about TPS status, researchers can estimate eligibility by analyzing respondents' nationality, year of immigration, and other factors to exclude those likely to have a different legal status. Researchers then use employment and earnings data from these individuals to estimate their overall economic contribution. I have reviewed the literature that estimates the economic benefits of TPS derived from the ACS, including the methodologies used in these studies, and summarize the findings below.

- a. An analysis by the American Immigration Council used data from the 2021 ACS to estimate the economic impact of more than 354,000 TPS holders from 12 countries. The study found that 94.6% of TPS holders were employed, earning a total of \$10.3 billion per year and paying \$2.2 billion annually in federal and state taxes. Additionally, 41% of TPS holders owned homes, contributing further through property taxes. (American Immigration Council, 2023). Adjusted to 2025 dollars using the Bureau of Labor Statistics CPI calculator, these numbers are \$12.5 billion in earnings and \$2.7 billion in federal and state taxes.
- b. An analysis by the Immigrant Legal Resource Center, using data from the 2015 ACS, estimated that approximately 300,000 TPS holders from El Salvador, Honduras, and Haiti earned a total of \$4.5 billion annually. They contributed \$691 million per year to Social Security and Medicare taxes. (Baran et al., 2017). Adjusted to 2025 dollars using the Bureau of Labor Statistics CPI calculator, these numbers are \$6.1 billion in earnings and \$940 million in Social Security and Medicare taxes annually. Venezuelans are not included in this estimate because they did not have TPS status in 2015, the year of analysis. However, this number is indicative of the positive economic impact of TPS holders writ large.
- c. An analysis of the 2010 and 2015 ACS found that the labor force participation rate for TPS holders from El Salvador, Haiti, and Honduras ranged from 81% to 88%. Median household income for TPS residents was \$50,000 for Salvadorans, \$40,000 for Hondurans, and \$45,000 for Haitians (adjusted to 2025 dollars using the Bureau of Labor Statistics CPI calculator, these numbers are \$68,000, \$54,000 and \$61,000 respectively). 30% of the TPS holders have a mortgage, indicating home ownership (Warren & Kerwin, 2017). Venezuelans are not included in this estimate because they did not have TPS status in 2010 or 2015, the years of analysis. However, this number is indicative of the positive economic impact of TPS holders writ large.

5. If Venezuelans lose TPS status, they will no longer have the legal right to work in the U.S. They will either be deported or stay in the country without legal authorization. If deported, they

1 will no longer contribute to the U.S. economy. If they stay and work without authorization, they may
 2 earn less and contribute less economically than they would with TPS status. Research shows that
 3 migrants with TPS have better job opportunities and wages relative to migrants with no immigration
 4 status. A study by Orrenius & Zavodny (2015) found that migrant men with TPS earn 13% more
 5 than migrant men without it, and migrant women with TPS are 17% more likely to have jobs
 6 compared to migrant women without TPS. If losing TPS has the opposite effect of gaining it, this
 7 means that people who lose their status may earn less or struggle to find work. As a result, even if
 8 they are not deported, their reduced earnings and employment rates would lead to lower overall
 9 economic output for the U.S.

10 6. TPS allows workers to hold formal jobs and pay payroll taxes, thus contributing to
 11 the U.S. economy. Without legal work status, more Venezuelan TPS holders who have not yet been
 12 deported may turn to informal jobs. Informal workers often do not pay payroll taxes (and deported
 13 workers certainly pay no taxes). This would reduce funding for Social Security and Medicare, which
 14 can have a broader economic impact. For example, in Los Angeles County in 2005, informal
 15 employment led to an estimated \$2 billion in unpaid payroll taxes compared to if those workers had
 16 been formally employed. (Flaming et al., 2005).

17 7. Additional economic costs to ending TPS are costs to firms for needing to replace
 18 workers who were previously legally employed, and costs to the government to deport individuals.
 19 The report by the Immigrant Legal Resource Center (Baran et al., 2017) estimates the economic cost
 20 of these two additional channels as follows:

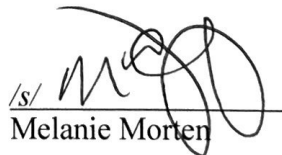
- 21 a. The report estimates that replacing laid-off TPS employees would cost firms
 22 \$967 million. Adjusted to 2025 dollars using the Bureau of Labor Statistics
 23 CPI calculator this number is \$1.3 billion.
- 24 b. Ending TPS would also impose costs on the government due to deportation
 25 expenses. The report uses a per-immigrant deportation cost of \$10,070.
 26 Adjusted for inflation to 2025 using the Bureau of Labor Statistics CPI
 27 calculator, this cost rises to \$13,700 per person. Deporting approximately
 28 350,000 Venezuelan TPS holders could therefore cost taxpayers an estimated
 \$4.8 billion.

1 8. More broadly, the National Academies of Sciences published a 2017 report on the
2 economic and fiscal impacts of immigration. (National Academies of Sciences, Engineering, and
3 Medicine, 2017). Since TPS holders are immigrants, the report's findings—though not specific to
4 TPS—are likely relevant. The report found little evidence that immigration negatively affects the
5 wages and employment of U.S.-born workers. It found evidence of positive effects, including lower
6 prices for U.S.-born workers. The findings of the report are summarized below.

- 7 a. The report found very little to no evidence of negative effects of immigration
8 on wages and employment of U.S.-born ("native") workers. The report
9 summarizes that "the impact of immigration on the wages of natives overall is
10 very small" (National Academies of Sciences, Engineering, and Medicine,
11 2017, p. 5), and that there is "little evidence that immigration significantly
12 affects the overall employment levels of native-born workers." (*Id.*).
13 b. An increase in immigration may also reduce the prices of some goods and
14 services, which is a benefit to US consumers. Overall, the report concluded
15 that "the contributions of immigrants to the labor force reduce the prices of
16 some goods and services, which benefits consumers in a range of sectors
17 including child care, food preparation, house cleaning and repair, and
18 construction." (*Id.*, p. 316).

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct to the best of my knowledge.

21 Executed this 20th day of February, 2025, in Stanford, California.

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/s/ Melanie Morten

1 References Cited

2 American Immigration Council. (2023). *The Contributions of Temporary Protected Status Holders*
3 *to the U.S. Economy*.

4 Baran, A., Magaña-Salgado, J., & Wong, T. K. (2017). *Economic Contributions by Salvadoran,*
5 *Honduran, and Haitian TPS Holders*. Immigrant Legal Resource Center.

6 Flaming, D., Haydamack, B., & Joassart, P. (2005). Hopeful Workers, Marginal Jobs. LA's Off-The-
7 Books Labor Force. *Economic Roundtable*.

8 National Academies of Sciences, Engineering, and Medicine. (2017). *The Economic and Fiscal*
9 *Consequences of Immigration* (F. D. Blau & C. Mackie, Eds.; p. 23550). National Academies Press.
10 <https://doi.org/10.17226/23550>

11 Orrenius, P. M., & Zavodny, M. (2015). The Impact of Temporary Protected Status on Immigrants'
12 Labor Market Outcomes. *American Economic Review*, 105(5), 576–580.
13 <https://doi.org/10.1257/aer.p20151109>

14 Warren, R., & Kerwin, D. (2017). A Statistical and Demographic Profile of the US Temporary
15 Protected Status Populations from El Salvador, Honduras, and Haiti. *Journal on Migration and*
16 *Human Security*, 5(3), 577–592.

APPENDIX A

Melanie Morten

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Stanford University
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Stanford, CA 94305
memorten@stanford.edu

Academic Positions

Associate Professor, Department of Economics, Stanford University, 7/2021-
Senior Fellow, Stanford Institute for Economic Policy Research (SIEPR), 7/2021-

Affiliations:

Stanford Center for Latin American Studies, Faculty Affiliate
Stanford Urban Studies, Faculty Affiliate
Abdul Latif Jameel Poverty Action Lab (JPAL), Affiliate
Bureau for Research and Economic Analysis of Development (BREAD)

- Fellow
- Member of Executive Committee

National Bureau for Economic Research, Research Associate
International Growth Center (IGC), Affiliate
Center for Economic and Policy Research (CEPR), Affiliate
Stanford King Center on Global Development, Affiliate
Center for Effective Global Action (CEGA), Affiliate
Motu Economic and Public Policy Research, Affiliate

Professional service:

Coeditor, *Journal of Urban Economics*, 1/2024-
Board of Editors, *Journal of Economic Literature*, 1/2024-
Foreign Editor, *Review of Economic Studies*, 10/2023-
Faculty Advisory Board, *Stanford Impact Labs*, 9/2023-
Advisory Board, *Stanford King Center on Global Development*, 9/2023-
Executive Committee, Bureau for Research and Economic Analysis of Development (BREAD), 6/2023-
Board Member, Bureau for Research and Economic Analysis of Development (BREAD), 5/2022-
Editorial Board Member, *Journal of Urban Economics*, 6/2022-12/2022
Associate Editor, *Review of Economics and Statistics*, 2/2019-9/2021

Education:

Ph.D., Economics (with distinction), Yale University, 2007-2013
 Thesis: "Temporary Migration and Endogenous Risk Sharing in Village India"
 Committee: Mark Rosenzweig, Aleh Tsyvinski, Chris Udry
 B.Com., (hons), The University of Auckland, 2005

Previous academic positions:

Visiting Scholar, Federal Reserve Bank of San Francisco, 1/2024-12/2024
 Assistant Professor, Department of Economics, Stanford University, 7/2014-7/2021
 Visiting Assistant Professor, Department of Economics, MIT, 7/2018-12/2018
 Junior Scholar, Research Department, Federal Reserve Bank of Minneapolis, 6/2013-6/2014
 Consultant for Macroeconomics (Karlán/Morduch) textbook, McGraw Hill, 1/2011-6/2011
 Research Assistant, World Bank Development Economics Research Group, 6/2009-8/2009
 Research Assistant, Motu Economic Research and Public Policy, Wellington, New Zealand, 2/2006-7/2007

Publications in peer-reviewed journals (reverse chronological order):

1. Morten, M. & Oliveira, J. (2024). [The Effects of Roads on Trade and Migration: Evidence from a Planned Capital City](#). *AEJ: Applied*, 16(2), 389-421.
2. Bryan, G., Chowdhury, S., Mobarak, A.M., & Morten, M (2023). [Encouragement and distortionary effects of conditional cash transfers](#). *Journal of Public Economics*, 228, 105004
3. Mobarak, A. M., Meghir, C., Mommaerts, C., & Morten, M (2022). [Migration and Informal Insurance](#). *The Review of Economic Studies*, 89(1), 452-480
4. Balboni, C., Bryan, G., Morten, M., & Siddiqi, B. (2021). [Could Gentrification Stop the Poor from Benefiting from Urban Improvements?](#) *American Economic Review: Papers and Proceedings*, 11, 532-537
5. Bryan, G. & Morten, M. (2019) [The Aggregate Productivity Effects of Internal Migration: Evidence from Indonesia](#). *Journal of Political Economy*, 127(5): 2229-2268.
6. Morten, M (2019), [Temporary Migration and Endogenous Risk Sharing in Village India](#). *Journal of Political Economy*, 127(1): 1-46. (Lead article)
7. Karlán, D., Morten, M. & Zinman, J. (2016). [A Personal Touch in Text Messaging can Improve Microloan Repayment](#). *Behavioral Science and Policy*, 1(2), 25-31.
8. Bollard, A., McKenzie, D., Morten, & M., Rapoport, H. (2011). [Remittances and the Brain Drain Revisited: The Microdata Show That More Educated Migrants Remit More](#). *World Bank Economic Review*, 25(1), 132-156.
9. Bollard, A., McKenzie, D., & Morten, M. (2010). [The Remitting Patterns of African Migrants in the OECD](#). *Journal of African Economics*, 19(5), 605-634.

Working papers (reverse chronological order):

10. Bryan, G., Frye, K., & Morten, M. (2025). [Spatial Economics for Low- and Middle- Income Countries](#). Chapter prepared for *Handbook of Regional and Urban Economics*.
11. Allen, T., Dobbin, C., & Morten, M. (2024). [Border Walls](#). NBER Working Paper 25267.

12. Balboni, C., Bryan, G., Morten, M., & Siddiqi, B. (2020). [Transportation, Gentrification, and Urban Mobility: The Inequality Effects of Place-Based Policies.](#)
13. Chandrasekhar, A., Morten, M., & Peter, A. (2020). [Network-based Hiring: Local Benefits; Global Costs.](#) NBER Working Paper 26806

Work in progress:

14. Maré, Dave, Morten, M., & Sanderson, L. “The economic impacts of labor shortages: Evidence from seasonal migration in NZ”
15. Magaloni, B. & Morten, M. “Immigration Law as Development Policy: Mexican Guestworkers and the H-2A Visa Program”

Grants as a Principal Investigator:

Evaluating the Impacts of the Dar es Salaam BRT System

1. Stanford SEED, 2017, (\$125,000)
2. 3ie, 2016, (\$249,477)
3. IGC, 2016, (GBP 132,346)

Contract Structure, Social Networks, and Firm Size

4. Stanford Center on Global Poverty and Development, 2017, (\$45,000)
5. NSF, 2014, (\$578,447) (joint with Arun Chandrasekar)

Seasonal Migration in Myanmar

6. G2LM|LIC, 2020, (Euro 334,777)

Immigration Law as Development Policy: Mexican Guestworkers and the H-2A Visa Program

7. NSF, 2022, (\$620,082)
8. K-CAI pilot grant (\$68,821)
9. [Stanford Guestworker Migration Initiative](#), King Center
10. Stanford Impact Labs Stage One funding

Fellowships, honors and awards:

Stanford Impact Labs Impact Lab Design Fellowship, 2021
 Sloan Research Fellowship, 2019-2021
 JEEA Excellence in Refereeing Award, 2018
 National Science Foundation CAREER Award, 2018-2023
 Stanford IRiSS Faculty Fellow, 2017-2018
 Yvette Gurley Research Scholar, Stanford, 2016
 Review of Economic Studies, May Meetings Speaker, 2013
 George Trimmins Dissertation Prize, 2013
 Poster Prize, NEUDC, MIT, 2010
 Robert Evenson Travel Fellowship, Yale University, 2010

Sasakawa Fellowship, Yale University, 2010
 Overbrook Fellowship, Yale University, 2009-2010
 A.R. Bergstrom Prize in Econometrics, 2008
 Yale Fellowship for Doctoral Study, 2007-2013
 Motu Doctoral Scholarship, New Zealand, 2007

Invited seminar presentations:

2025*	LSE
2024	UW, Oxford, UCL, NWU, UCSC
2023	Berkeley, Peking University, UC San Diego, USC
2022	Michigan, GWU
2021	UAB, Peking, World Bank, Chicago, U Penn, LSE, Minnesota
2020	UC Berkeley (Haas), UC Berkeley (ARE), University of Minnesota, University of Chicago Booth, Arizona State University
2019	UC Berkeley (ARE, International), UC Berkeley (Development), UCSD, UCLA, Wharton, Princeton, Oxford, Georgetown
2018	USC, UW Seattle, MIT/Harvard, Yale, Boston University
2017	Simon Fraser, UCSC, IFPRI, Namur, Paris School of Economics, Toulouse, Princeton
2016	University of Houston, USF, Duke, Penn State, IIES Stockholm, University of California Berkeley (Trade), University of California Berkeley (ARE), Dartmouth
2015	University of Chicago, University of Toronto, University of California Berkeley (Development)
2014	Harvard/MIT Joint Development Seminar, WUSTL/Federal Reserve Bank of St Louis, Brown University, University of Calgary
2013	Royal Holloway, UCL/LSE Joint Development Seminar, University of Oxford, USC
Job Market	UCLA, University of Minnesota, University of Chicago, Stanford GSB, Stanford, UCL, Harvard University, University of Wisconsin Madison, Princeton University, Northwestern University

Conference presentations:

2024	Econometric Society, 2024 African Meeting (keynote); UCLA miniconference on Spatial Economics, IEB (keynote); Spatial Economics Conference, Princeton.
2023	ADB conference on Infrastructure and Urban Development in the Developing World (keynote)
2022	BSE Summer Forum (Migration)
2021	RIDGE
2020	BREAD, ASSA (x2)
2019	American Economic Association, FRB Dallas - U. of Houston - Banco de Mexico Conference in International Economics
2018	UCLA Trade/Devo Mini Conference, SED Mexico City, NBER Summer Institute (Labor Studies), Urban Economics Association
2017	NBER Trade and Geography Conference, Notre Dame Development Mini-Conference, NBER Summer Institute (Development)

2016 ASSA meetings, U Washington Bangladesh Conference, SED, Duke Applied Microeconomics Jamboree

2015 NBER Summer Institute (Economic Growth; Productivity and Entrepreneurship; Urban Economics), Armenia Mini-Conference on Growth and Development, SED Warsaw, Barcelona Summer Workshop on Migration, UCLA Trade/Devo Mini Conference, Oxford Center for Study of African Economies Conference

2014 ASSA meetings, NBER Summer Institute (Development Economics), AFD/CGD Migration and Development Conference (Oxford), PODER/CEPR Workshop (Stockholm), IFS/CEAR Family and Risk Workshop

2013 Restud May Meetings (Central European University Budapest, Goethe University Frankfurt, University of Edinburgh), IZA/WZB Field Days Conference (Berlin), NBER Summer Institute (Development Economics)

2012 NEUDC (Dartmouth), CEAR Households and Risk Workshop (University of Georgia)

2011 NEUDC (Yale), Advances with Field Experiments Conference (University of Chicago)

2010 NEUDC (MIT, Poster), Migration and Development Conference (Paris School of Economics)

* including scheduled

Public and Departmental Service:

Stanford Director of Graduate Studies: 2022-
Stanford Placement Co-Director: 2021
Stanford Graduate Admissions Committee: 2015—2016
Stanford Undergraduate Policy Committee: 2019—2021

Scientific Committee, BSE Development 2024
Program Committee, Econometric Society Meetings, 2023
Program Committee, Asia Meeting of the Econometric Society (AMES), 2023
Mentor, Research in Color Foundation: 2022
Coorganizer BREAD/IGC Virtual PhD course, Migration module: 2022
Scientific Committee, Migration and Development Conference, 2018—current
Program Committee, Society for Economic Dynamics Conference: 2015—2018

Referee Service:

American Economic Journal: Applied Economics, American Economic Review, Economic Development and Cultural Change, Econometrica, Economic Journal, Innovations for Poverty Action Research Review Committee, Journal of Development Economics, Journal of the European Economic Association, Journal of Human Capital, Journal of Human Resources, Journal of Economic Geography, Journal of Political Economy, Journal of Urban Economics, Quarterly Journal of Economics, Regional Science, Review of Economic Dynamics, Review of Economics and Statistics, Review of Economic Studies, Science, Scandinavian Journal of Economics, World Bank Economic Review.

Ad-hoc reviewer for Innovations for Poverty Action, the National Science Foundation, and the European Research Commission.

PhD students:

(Secondary committee member, unless otherwise noted. Initial placement noted.)

Eva Lestant, expected 2027
Akhila Kovvuri, expected 2026
Alvaro Calderon, expected 2025
Caylee O'Connor, expected 2024
Renan Yoshida, expected 2024
Mark Walsh, 2024 (Givewell)
Sally Zhang, 2023 (Princeton postdoc)
Cauê Dobbin, 2022 (Georgetown)
Eduardo Muggenberg, 2021 (Facebook)
Diego Javier Hernandez, 2021 (Federal Reserve)
Yiming He, 2021 (Uber)
Alessandra Peter, 2019, (NYU)
Thomas Ginn, 2019, (Center for Global Development)
Travis Baseler, 2019, (Rochester)
Katy Bergstrom, 2019, (World Bank)
Kevin (Hoan) Nguyen, 2017, (Amazon)
Santiago Perez, 2017, (UC Davis)
Santiago Saavedra, 2017, (Universidad del Rosario)
Michela Giorcelli, 2016, (UCLA)

Courses taught:

Graduate development economics (2014—2023)
Undergraduate development economics (2020—2022)
Introductory economics (2014—2016)

Updated: 2/3/2025